

IN THE UNITED STATE COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA

Norfolk Division

UNITED STATES OF AMERICA	)	Criminal No. 2:19CR47
	)	
v.	)	
	)	
DAVID ALCORN,	)	
	)	
AGHEE WILLIAM SMITH II,	)	
	)	
THOMAS L. BARNETT, &	)	
	)	
NORMA JEAN COFFIN,	)	
	)	
Defendants.	)	

**GOVERNMENT’S PROPOSED PRE-VOIR DIRE STRIKES FOR CAUSE**

The United States of America, through its undersigned counsel, respectfully files its proposed pre-voir dire strikes for cause based on the venire panel’s responses to the juror questionnaire used in this case. The chart below lists the juror number and a brief summary of the reason or reasons for the motions to strike.

JUROR NUMBER	REASON FOR PROPOSED PRE-VOIR DIRE STRIKE FOR CAUSE
11	Planned travel during trial in December
12	Health concerns and claimed inability to understand questionnaire
15	Impending birth of grandchild; elder caretaker; concern with judging others
22	Planned travel during trial in December
34	Financial hardship and potential bias
40	International travel during trial
43	Full-time college student
45	Planned travel during trial in December
58	Financial hardship and claimed bias and inability to follow court instructions
62	Multiple statements of inability to judge
65	Major surgery scheduled for early December
67	Financial hardship – commission-only salary
71	Planned travel during trial in December

73	Planned travel during trial in December
74	Planned travel during trial in November
76	Planned travel during trial in November
77	Planned travel during trial in November
84	Planned travel for out-of-state graduation
96	Physician with covid patients
103	Medical concerns making it difficult to sit
104	Financial hardship
106	Financial hardship
110	Planned travel and work travel; potential bias
112	Inability to sit in judgment and make decisions; potential bias
113	Claimed inability to sit in judgment of others
115	Financial issues; anxiety; difficulty sitting in judgment
118	Planned travel during trial in December
132	Financial hardship and primary caregiver for grandchild
138	Pre-booked work travel
143	High school teacher with prepaid travel
147	Prepaid international travel
148	Contracted performances out of state during trial
156	Planned travel during trial in November
171	Planned travel during trial in November

Respectfully submitted,

Jessica D. Aber  
United States Attorney

By:                     /s/                      
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CERTIFICATE OF SERVICE

I hereby certify that on the 3rd of November, 2021, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification to registered counsel.

/s/

Elizabeth M. Yusi

Assistant United States Attorney